

THE ATKIN FIRM, LLC

Formed in the State of New Jersey

By: John C. Atkin, Esq.

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Attorneys for Plaintiff Strike 3 Holdings, LLC

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

STRIKE 3 HOLDINGS, LLC,

Plaintiff,

v.

JOHN DOE subscriber assigned IP
address 72.76.169.60,

Defendant.

Case No. 3:23-cv-20620-RK-JBD

**NOTICE OF MOTION
FOR EXTENSION OF TIME
WITHIN WHICH TO
EFFECTUATE SERVICE**

**TO: ALL COUNSEL OF RECORD IN THE ABOVE CAPTIONED
MATTER**

PLEASE TAKE NOTICE that on January 16, 2024, at 9:30 a.m., or as soon thereafter as counsel may be heard, the undersigned attorneys for Plaintiff Strike 3 Holdings, LLC (“Plaintiff”) will move before the Honorable J. Brendan Day, U.S.M.J., of the United States District Court for the District of New Jersey, at the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, NJ

08608, for an Order granting an extension of time within which to effectuate service of process in this matter, pursuant to Federal Rule of Civil Procedure 4(m).

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 7.1(d)(4), Plaintiff states that no brief is necessary because Plaintiff will rely upon the Certification of John C. Atkin, Esq., to explain the lack of service to date and show good cause for the requested extension, submitted herewith; any reply papers in support of this Motion; and oral argument, if any.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 7.1(e), a proposed form of order is also submitted herewith for the Court's consideration.

DATED: December 21, 2023

Respectfully submitted,

THE ATKIN FIRM, LLC

*Attorneys for Plaintiff,
Strike 3 Holdings, LLC*

By: /s/ John C. Atkin, Esq.
JOHN C. ATKIN